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Attorneys for Plaintiff Joshua Chatwin

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH CENTRAL DIVISION

JOSHUA CHATWIN,

Plaintiff,

v.

DRAPER CITY; DRAPER CITY POLICE
DEPARTMENT; POLICE CHIEF MAC
CONNOLE; OFFICER J. PATTERSON, in
his individual and official capacity; OFFICER
DAVID HARRIS, in his individual and
official capacity; OFFICER HEATHER
BAUGH, in her individual and official
capacity; and JOHN DOES 1-10,

Defendants.

PLAINTIFF'S OBJECTIONS TO
DEFENDANTS' PRETRIAL
DISCLOSURES

Civil No. 2:14-cv-375
Judge Dale A. Kimball

Pursuant to Rule 26(a)(3)(B), Federal Rules of Civil Procedure, Plaintiff Joshua Chatwin
("Chatwin") hereby objects to Defendants' Pretrial Disclosures as follows:

WITNESSES

Chatwin objects to the following witnesses because they have never been identified by name by Defendants. Chatwin therefore has no means to contact these individuals:

16. Manager at Guadalahonky's & Co.
17. Manager at Fast PC Solutions, LLC
18. Manager at Laser Stop, LLC
19. Manager at Rock Creek Pizza
20. Manager at O'Curran, Inc.
21. Manager at Z'tejas
22. Manager at Educators Mutual Insurance
23. Manager at Lube Management Corp.
24. Manager at Brightstar Wireless, Inc.
25. Manager at Slaymaker Group/Wingers Diner
26. Manager at Convergys Corp.
27. Manager at Larry Miller Subaru
28. Manager at Spirit Wireless
29. Manager at American Satellite Co.
30. Manager at Discount Tire

EXHIBITS

Chatwin may object to the admissibility of the exhibits Defendants intend to offer at trial as follows:

1. DUI Report Form, DRAPER-CHT-00064-67. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.
2. Citation, DRAPER-CHT-00068. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/

Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

3. Draper City Police Report, DRAPER-CHT-00069-86. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

4. Field Training Manual, DRAPER-CHT-0668-688. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

5. Draper City Police Report, DRAPER-CHT-4060-4094. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

Chatwin may object to the admissibility of the exhibits Defendants may use at trial as follows:

1. Search Warrant, DRAPER-CHT-00087-88. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

2. Blood Test Lab Results, DRAPER-CHT-00089. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to

support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

3. Draper Police 2012 Yearly Training, DRAPER-CHT-0168-170. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

4. June 2012 Firearms Agenda, DRAPER-CHT-0171. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

5. November 2012 Defensive Tactics Dept. Training, DRAPER-CHT-0175-179. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially

outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

6. Draper City Use of Force Policy, DRAPER-CHT-0180-192. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

7. November 2012 Defensive Tactics Dept. Training Outline, DRAPER-CHT-0193-197. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

8. November 2012 Defensive Tactics Dept. Training Outline, DRAPER-CHT-0198-202. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

9. Draper City Police Firearms Spreadsheet, DRAPER-CHT-201-205. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

10. 2013 Draper City Dept. Yearly Training, DRAPER-CHT-206-208. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

11. 1/15/2013 Draper City Police Training Roster, DRAPER-CHT-209. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

12. November 2012 Defensive Tactics Dept. Training, DRAPER-CHT-0213-217. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the

truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

13. 6/18/2013 Draper City Police Firearms, DRAPER-CHT-0218. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

14. 2/12/2013 Draper City Police Firearms, DRAPER-CHT-0220-223. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

15. Draper PD Defensive Tactics Training Outline, DRAPER-CHT-0254-260. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules

402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

16. 4/21/2015 Draper PD Training Roster – Legal Update, DRAPER-CHT-0262. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

17. 2014 Draper PD Yearly Training, DRAPER-CHT-0305-307. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

18. 2015 Draper PD Yearly Training, DRAPER-CHT-308-309. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a

danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

19. Confrontation Management: The 10 Commandments of Officer Survival, DRAPER-CHT-0413-414. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

20. 12/11/2012 Draper City Police Training Roster First Aid/CPR, DRAPER-CHT-0599. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

21. 12/18/2012 Draper City Police Training Roster First Aid/CPR, DRAPER-CHT-0600. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

22. Draper PD 2012 Yearly Training Record, DRAPER-CHT-0601-606. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

23. Draper PD 2014 Yearly Training Record, DRAPER-CHT-0607-609. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

24. Citizen Complaint Investigation regarding Officer Patterson, DRAPER-CHT-0610-616. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

25. Citizen Complaint Investigation regarding Officer Patterson, DRAPER-CHT-0617-620. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered

for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

26. January 2014 Training Rosters, DRAPER-CHT-0694-701. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

27. December 2012 Training Rosters, DRAPER-CHT-0713-714. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

28. Unified State Lab Bureau of Forensic Toxicology blood test, DRAPER-CHT-4095. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules

402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

29. Charging Information, DRAPER-CHT-4096-4099. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

30. Arrest Warrant, DRAPER-CHT-4100-4101. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

31. Witness Statement Heathyr Best, DRAPER-CHT-4102. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

32. Witness Statement Jason Kamp, DRAPER-CHT-4103. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter

asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

33. Forensic Toxicology Statement, DRAPER-CHT-4104. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

34. Witness Statement Mike Washburn, DRAPER-CHT-4105. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

35. Witness Statement Chris Middlemiss, DRAPER-CHT-4106. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

36. Witness Statement Janessa Huff, DRAPER-CHT-4107. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

37. DPD Training Assessment for Sworn Staff, DRAPER-CHT-4115-4123. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a

danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

38. DPD Training Assessment Non-sworn Staff, DRAPER-DHT-4124-4132.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

39. DPD Training Assessment for Specialty Assignments, DRAPER-CHT-4133-

4146. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

40. 2015 Employee Training Assessment and Career Path Plan, DRAPER-CHT-

4147-4154. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

41. Interoffice Memo regarding Officer Patterson, DRAPER-DHT-4167-4168.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the

truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

42. Letter of Commendation regarding Officer Patterson, DRAPER-CHT-4169-4171. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

43. 2013 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4179-4182. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

44. 2011 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4185-4188. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it

claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

45. 2010 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4190-4193. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

46. Sept. 2008 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4195. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

47. 2009 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4196-4199. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative

value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

48. May 2008 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4202-4203. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

49. June 2008 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4204-4216. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

50. Dec. 2007 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4218. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

51. June 2007 Draper City Employee Performance Appraisal, Heather Baugh, DRAPER-CHT-4220. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

52. Oct. 2007 Draper City Police Dept. Evaluation Report, DRAPER-CHT-4222. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

53. Oct. 2014 Draper City Employee Performance Appraisal, DRAPER-CHT-4223-4226. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

54. October 2012 Draper City Employee Performance Appraisal, DRAPER-CHT-4227-4230. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being

offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

55. Dec. 2007 Draper City Employee Performance Appraisal, DRAPER-CHT-4231. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

56. August 2014 Letter of Commendation, Heather Baugh, DRAPER-CHT-4232. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

57. March 2013, Letter of Commendation, Heather Baugh, DRAPER-CHT-4233. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules

402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

58. February 2012 Letter of Commendation, Heather Baugh, DRAPER-CHT-4234-4236. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

59. Acknowledgement of Draper City PD policy manual, DRAPER-CHT-4257. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

60. 3/8/2013 Supervisor Training Certificate of Completion, David Harris, DRAPER-CHT-4643. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be.

61. 12/27/13 Letter of Commendation to Sgt. Harris, DRAPER-CHT-4649. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R.

Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

62. 5/8/07 Letter of Commendation Officer Harris, DRAPER-CHT-4642-4652. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

63. 3/13/07 Letter of Commendation Officer Harris, DRAPER-CHT-4653-4655. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

64. Draper City PD Policy Manual Acknowledgement Form, Harris, DRAPER-CHT-4676. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially

outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

65. 10/28/14 Draper City Employee Performance Appraisal/Review, Harris, DRAPER-CHT-4690-4693. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

66. 11/21/13 Draper City Employee Performance Appraisal/Review, Harris, DRAPER-CHT-4695-4698. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

67. 6/14/13 Draper City Employee Performance Appraisal/Review, Harris, DRAPER-CHT-4701. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

68. 10/26/2012 Draper City Employee Performance Appraisal/Review, Harris, DRAPER-CHT-4703-4706. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

69. 10/21/2011 Draper City Employee Performance Appraisal, Harris, DRAPER-CHT-4714-4717. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

70. 11/1/10 Draper City Employee Performance Appraisal, Harris, DRAPER-CHT-4722-4726. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

71. 9/1/08 Employee Performance Evaluation, Harris, DRAPER-CHT-4727. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the

matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

72. 2/13/09 Employee Performance Evaluation, Harris, DRAPER-CHT-4728-4731. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

73. 4/14/08 Employee Performance Evaluation, Harris, DRAPER-CHT-4735-4736. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

74. 4/19/08 Draper City Employee Evaluation, Harris, DRAPER-CHT-4737-4749. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules

402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

75. 7/19/08 Employee Performance Evaluation, Harris, DRAPER-CHT-4751-4752. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

76. 5/15/07 Employee Performance Evaluation, DRAPER-CHT-4758. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

77. Case Dockets regarding Plaintiff, DRAPER-CHT-4771-5002. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a

danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

78. 4/12/2009 Police Report regarding Josh Chatwin, DRAPER-CHT-5003. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

79. 7/8/10 Police Report regarding Josh Chatwin, DRAPER-CHT-5004-5006. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

80. 4/8/11 Police Report regarding Kathy Torrence, DRAPER-CHT-5007-5008. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

81. 8/20/11 Police Report regarding Kathy Torrence, DRAPER-CHT-5009-5010. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

82. 9/9/11 Police Reports regarding Kathy Torrence, DRAPER-CHT-5011-5014. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

83. 9/18/11 Police Report regarding Kathy Torrence, DRAPER-CHT-5015-5016. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

84. 10/8/11 Police Report regarding Kathy Torrence, DRAPER-CHT-5017-5018. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the

truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

85. 7/3/12 Police Report regarding Josh Chatwin, DRAPER-CHT-5019. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

86. 1/24/13 Police Report regarding Jason Scott, DRAPER-CHT-5022-5023. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

87. 2/23/2013 Police Report regarding Josh Chatwin, DRAPER-CHT-5024. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R.

Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

88. 3/7/2013 Police Report regarding Kathy Torrence, DRAPER-CHT-5025.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

89. 7/31/2013 Police Report regarding Josh Chatwin, DRAPER-CHT-5026-5027.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

90. 1/11/14 Police Report regarding Josh Chatwin, DRAPER-CHT-5028-5029.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially

outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

91. 5/26/15 Police Report regarding Josh Chatwin, DRAPER-CHT-5032-5034. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

92. 10/3/04 Police Report regarding Josh Chatwin, DRAPER-CHT-5040-5045. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

93. 4/22/05 Police Report regarding Josh Chatwin, DRAPER-CHT-5048-5049. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

94. 4/9/06 Police Report Regarding Josh Chatwin, DRAPER-CHT-5054-5055. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

95. 10/21/06 Police Report Regarding Kathy Torrence, DRAPER-CHT-5056-5058. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

96. 6/25/07 Police Report regarding Kathy Torrence, DRAPER-CHT-5059-5060. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

97. 7/16/07 Police Report regarding Josh Chatwin, DRAPER-CHT-5065-5064. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the

truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

98. 4/9/09 Police Report regarding Josh Chatwin, DRAPER-CHT-5065-5067.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

99. Josh Chatwin Employment Records, Convergys, DRAPER-CHT-5068-5075.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rule 402, Fed. R. Evid., this evidence is not relevant.

100. Josh Chatwin Employment Records, Honda World, DRAPER-CHT-5076-5080.

Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rule 402, Fed. R. Evid., this evidence is not relevant.

101. Josh Chatwin Employment Records, Discount Tire, DRAPER-CHT-5081-5114. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rule 402, Fed. R. Evid., this evidence is not relevant.

102. Josh Chatwin Employment Records, Guadalahonky's, DRAPER-CHT-5115. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rule 402, Fed. R. Evid., this evidence is not relevant.

103. Josh Chatwin Employment Records, Jiffy Lube, DRAPER-CHT-5116-5126. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rule 402, Fed. R. Evid., this evidence is not relevant.

104. Josh Chatwin Employment Records, Laserstop, DRAPER-CHT-5127-5128. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rule 402, Fed. R. Evid., this evidence is not relevant.

105. Josh Chatwin Employment Records, O'Curran, DRAPER-CHT-5129-5171. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must

produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rule 402, Fed. R. Evid., this evidence is not relevant.

106. Trevor Petersen 1099-MISC, DRAPER-CHT-5209. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

107. Trevor Petersen Earnings Summary, DRAPER-CHT-5210. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

108. 9/23/2015 Trevor Petersen Application, DRAPER-CHT-5215-5224. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

109. Josh Chatwin Renaissance Ranch Records, DRAPER-CHT-5282-5479. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

110. 7/17/15 Police Report regarding Kirk Torgensen, DRAPER-CHT-5491-5497. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

111. Court Docket regarding Kirk Torgensen, DRAPER-CHT-5516-5518. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

112. Kirk Torgensen Arrest Mugshots, DRAPER-CHT-5519-5520. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter

asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

113. Signed Plea Information, Kirk Torgensen, DRAPER-CHT-5521. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

114. Jail Release Agreement, Kirk Torgensen, DRAPER-CHT-5522-5523. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

115. Information, DRAPER-CHT-5524-5527. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this

evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

116. Minutes regarding Change of Plea, Pea in Abeyance, DRAPER-CHT-5528. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

117. News Article involving Kirk Torgensen, DRAPER-CHT-5529-5530 Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

118. News Article involving Kirk Torgensen, DRAPER-CHT-5531-5534. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a

danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

119. News Article involving Kirk Torgensen, DRAPER-CHT-5535-5538. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

120. News Article involving Kirk Torgensen, DRAPER-CHT-5539-5543. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

121. Josh Chatwin Valley Mental Health Records, DRAPER-CHT-5630-5651. Hearsay, Fed. R. Evid. 802, this exhibit contains out-of-court statements being offered for the truth of the matter asserted; Authenticity/Foundation, Fed. R. Evid. 901, Defendants must produce evidence sufficient to support a finding that this exhibit is what it claims to be; Rules 402 and 403, Fed. R. Evid., this evidence is not relevant and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, and/or needlessly presenting cumulative evidence.

DATED this 13th day of December 2016.

CLYDE SNOW & SESSIONS

/s/ Lisa A. Marcy

Lisa A. Marcy

Attorneys for Plaintiff Joshua Chatwin

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of December 2016, I electronically filed the foregoing Plaintiff's Objections to Defendants' Pretrial Disclosures with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

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